



Lunar Freezing & Cold Storage Company Limited

Modern Slavery Statement

This statement has been published in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. It sets out the steps taken by Lunar Freezing & Cold Storage Company Limited to prevent modern slavery and human trafficking in our own operation and supply chain. This statement refers to the financial year ending 31 December 2018

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Structure and Supply Chains

Based in the fishing ports of Peterhead, Fraserburgh and Aberdeen, Lunar Freezing and Lunar Fishing are in a commanding position to supply herring, mackerel, blue whiting and whitefish products from catching to final delivery worldwide.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our zero-tolerance approach to modern slavery has been communicated to all customers, colleagues, suppliers and all third party contacts at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policies on Modern Slavery

We operate a Modern Slavery Policy and a Corporate Social Responsibility Policy and both have been communicated to all our suppliers.

Our Ethical Trading Policy (ETP) requires all our suppliers to comply with our ethical code which is based on the Ethical Trading Initiative (ETI), the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws. This policy sets out the standards that we expect to be in place throughout our supply chain. We seek to develop long term relationships with our suppliers who share our ethical standards.

We also operate a Whistleblowing Policy where suppliers, workers and other stakeholders can confidentially raise any concerns about breaches of human rights or modern slavery in the supply base, as well as to receive feedback about our own standards

Lunar Freezing & Cold Storage Company Limited is committed to conducting all of its business in an honest and ethical manner. In accordance with the Bribery Act 2010 we operate governance by implementing and enforcing robust policies and procedures to guard against any illegal behaviour.

Due Diligence Process and Risk Assessment

We are committed to continuously improving our practices to identify and eliminate any forms of slavery or human trafficking in our own operations and our supply chain.

As a core element of due diligence process we have mapped our supply chain which we continuously assess and evaluate to measure human rights risk and impact assessment.

The Ethical Self Questionnaire has been developed to help us collect, monitor and analyse data in regards to ethical standards of our suppliers. If suppliers are unable or unwilling to address critical issues associated with any breach of our Modern Slavery Policy within the required timescales, we reserve the right to terminate the relationship in accordance with our contractual rights

All our labour providers work closely with the Gangmaster and Labour Abuse Authority. We also review annually their compliance with our Ethical Trading Policy and ETI Base Code. Integral parts of the annual review process are confidential worker interviews.

Sedex is the largest collaborative platform for sharing responsible sourcing data on supply chain. Being a member of Sedex is a sign of our company's willingness to share information and to use this information to help drive improvements in the ethical performance of our supply chain and to make continuous improvement in regards to the ethical standards within our own operation.

Training for staff

We have reviewed all human resource policies and processes including recruitment, induction and training. All new policies have been communicated to all individuals who work for us.

As a result of this, training on human rights and modern slavery now forms part of the induction process. The Ethical Trading Initiative Base Code becomes part of our formal procedure on human rights and it has been communicated to all staff in different languages.

Management at all levels are responsible for ensuring those reporting to them understand and comply with Modern Slavery policy and are given adequate training on it.



Sinclair Banks, General Manager

7th December 2018